

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

IN RE: *EX PARTE* APPLICATION OF)
LAURA ZÚNIGA CÁCERES, BERTHA)
ZÚNIGA CÁCERES, AND SALVADOR)
ZÚNIGA CÁCERES FOR ASSISTANCE)
BEFORE A FOREIGN TRIBUNAL)
_____)

CASE NO.: 1:19-mc-00405-LG-RHW

**REPLY IN SUPPORT OF MOTION TO STRIKE REBUTTAL FILED
BY APPLICANTS AS PROCEDURALLY IMPROPER**

Interested Party, Tanya Romero-Baca, files this reply in support of her Motion to Strike Rebuttal Filed by Applicants as Procedurally Improper [Doc. 35]. The Local Rules do not provide for a Rebuttal in support of Objections to a Magistrate Judge's ruling and, comparing the rule on general motions versus those dealing specifically with objections to a Magistrate Judge's rulings, strongly indicates this was the drafters' intent. The case law cited by Applicants does not hold to the contrary or even discuss the issue further supporting that Applicant's Rebuttal in Support of Their Objections to Report and Recommendation [Doc. 34] should be stricken.

RESPECTFULLY SUBMITTED, this the 17th day of December 2019.

**Attorneys for Interested Party,
Tanya Romero-Baca**

WEBB SANDERS & WILLIAMS, P.L.L.C.
363 NORTH BROADWAY
POST OFFICE BOX 496
TUPELO, MISSISSIPPI 38802
TELEPHONE: (662) 844-2137
B. WAYNE WILLIAMS, MSB #9769
wwilliams@webbsanders.com
NORMA CARR RUFF, MSB #5721
nruff@webbsanders.com

**BY: /s/ B. Wayne Williams
B. WAYNE WILLIAMS**

LEWIS ROCA ROTHGERBER CHRISTIE LLP

201 East Washington Street, Suite 1200

Phoenix, AZ 85004-2595

Telephone: 602-262-5337

Randy Papetti (AZ State Bar No. 014586)

rpapetti@lrrc.com

Jared Sutton (AZ State Bar No. 028887)

jsutton@lrrc.com

Jennifer Lee-Cota (AZ State Bar No. 033190)

jlee-cota@lrrc.com

CERTIFICATE OF SERVICE

I, B. Wayne Williams, one of the attorneys for Tanya Romero-Baca, do hereby certify that I have this date filed the above and foregoing ***Reply in Support of Motion to Strike Rebuttal Filed by Applicants as Procedurally Improper*** using the Court's electronic filing system which in turn served a true and correct copy of the same to counsel of record as follows:

Amelia S. McGowan, Esq.
Mississippi Center for Justice
P.O. Box 1023
Jackson, Mississippi 39215
amcgowan@mscenterforjustice.org

Leo P. Cunningham, Esq.
Ralitza S. Dineva, Esq.
Sean P. Killeen, Esq.
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
650 Page Mill Road
Palo Alto, California 94304-1050
lcunningham@wsgr.com
rdineva@wsgr.com
skilleen@wsgr.com

Roxanna Altholz, Esq.
INTERNATIONAL HUMAN RIGHTS LAW
CLINIC, UNIVERSITY OF CALIFORNIA
BERKELEY
489 Simon Hall
Berkeley, California 94720
raltholz@law.berkeley.edu

This the 17th day of December 2019.

/s/ B. Wayne Williams
B. WAYNE WILLIAMS